

VARACALLI & HAMRA, LLP

32 BROADWAY, SUITE 1818, NEW YORK, NY 10004
TEL: 646-590-0571, FAX: 646-619-4012
WEB: WWW.VHLLP.COM

February 7, 2020

VIA ECF

Honorable Robert W. Lehrburger
United States District Court
Southern District of New York
40 Foley Square
New York, New York, 10007

**Re: GALINDO GARCIA v. GREAT BURRITO ET AL.
Case # 1:18-cv-06165-ALC-RWL**

Dear Judge Lehrburger,

Your undersigned represents defendants in the above captioned action. I write today to request a second extension of discovery in the above captioned matter. Defendants have provided Plaintiff with the relevant discovery payroll records and responses to interrogatories and are attempting to resolve the matter. I had made numerous attempts to contact Plaintiff's counsel over the past month, but only today realized that counsel is dealing with a pressing familial matter that he will be out of the office until February 24, 2020.

As such, we respectfully request that discovery be extended up and through April 20, 2020 to allow the parties to have fruitful settlement discussion and/or conduct the relevant depositions of the parties.

The parties thank the Court in advance for the consideration of this request.

Respectfully Submitted,



By: Anthony R. Portesy
Attorneys for Defendants

CC: all counsel, via ECF.